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October 2, 2018

**VIA ELECTRONIC FILING**

The Honorable Jocelyn G. Boyd  
Chief Clerk/Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29210

**Re:** Petition Duke Energy Carolinas LLC and Duke Energy Progress, LLC for  
Approval of CRPE Queue Number Proposal, Limited Waiver of Generator  
Interconnection Procedures, and Request for Expedited Review  
**Docket Number 2018-202-E**

Dear Ms. Boyd:

Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP”) (collectively, the “Companies”) respectfully submit this letter to the Public Service Commission of South Carolina (“Commission”) in response to the September 21, 2018 position statement filed by the South Carolina Office of Regulatory Staff (“ORS”) (“ORS Position Statement”), as well as the joint comments filed by the South Carolina Solar Business Alliance (“SC SBA”) and Ecoplexus, Inc. on September 27, 2018 (“Joint SC SBA/Ecoplexus Comments”), and the comments included in First Solar, Inc.’s August 29, 2018 Petition to Intervene (collectively, the “Commenting Parties”). The Companies hereby notify the Commission that they intend to file responsive comments on or before October 12, 2018.

The Companies are also providing notice that they plan to preliminarily—and subject to a final Commission determination in this proceeding—establish a CPRE Queue Number on the Tranche 1 request for proposal (“RFP”) solicitation proposal due date, October 9, 2018, for interested South Carolina solar generating facility Interconnection Customers (“SC Solar Generators”) to bid into the Competitive Procurement of Renewable Energy Program (“CPRE” or “CPRE Program”) consistent with the approach planned for North Carolina solar generating facility Interconnection Customers. If the Commission denies the Petition, the Companies will remove all SC Solar Generators from the CPRE Queue Numbers and inform the CPRE Program Independent Administer, Accion, Inc., that South Carolina-sited proposals would need to be separately evaluated for potential grid upgrades under the existing serial interconnection study process.

As noted by ORS, SC SBA, and Ecoplexus, the North Carolina Utilities Commission (“NCUC”) has not yet ruled on the Companies’ request for approval of the same CPRE Program grouping study pending in North Carolina, and recently scheduled oral argument to hear from the Companies and other parties regarding the proposed North Carolina CPRE Queue Number and CPRE grouping study proposals.<sup>1</sup> The NCUC also ordered the Companies to delay the CPRE Tranche 1 proposal due date originally scheduled to close on September 11, 2018, by one month, to October 9, 2018, in order to allow the NCUC additional time to receive comments and deliberate on the proposed CPRE grouping study proposal. Oral argument on this matter was held on September 24, 2018, in the NC interconnection proceeding, Docket No. E-100, Sub 101,<sup>2</sup> and the Companies anticipate that the NCUC will issue an order prior to October 9, 2018 ruling on the CPRE Queue Number and grouping study proposal for North Carolina. In the Companies’ responsive comments to be filed no later than October 12, 2018, the Companies will update the Commission on the status or outcome of the NCUC proceeding, as recommended by ORS.

Should you have any questions regarding this matter, please do not hesitate to contact me at 803.988.7130.

Sincerely,



Rebecca J. Dulin

cc: Parties of Record

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<sup>1</sup> See *Order Scheduling Hearing, Requesting Comments, and Extending Tranche 1 CPRE Solicitation Response Deadline*, NCUC Docket Nos. E-100, Sub 101, E-2, Sub 1159, and E-7, Sub 1156 (Aug. 10, 2018); see also *Order Granting Extension of Time and Rescheduling Oral Argument*, NCUC Docket No. E-100, Sub 101 (Sept. 13, 2018).

<sup>2</sup> The transcript of the arguments along with all pre-filed comments and the Companies’ supplemental responses to the NCUC’s questions can be found in NCUC Docket No. E-100, Sub 101, *available at* <https://starw1.ncuc.net/NCUC/page/docket-docs/PSC/DocketDetails.aspx?DocketId=b8c5f6f2-943d-4504-8cdf-718f5ca434de>.